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8	UNITED STATES DISTRICT COURT
9	DISTRICT OF NEVADA
10	

Case No. 3:25-cv-00039-ART-CSD

LAURA LEIGH, individually, and WILD HORSE EDUCATION, a non-profit corporation,

Plaintiffs,

VS.

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INTERIOR BOARD OF LAND APPEALS, UNITED STATES DEPARTMENT OF INTERIOR, BUREAU OF LAND MANAGEMENT, and KG MINING INC.,

Defendants.

STIPULATION TO EXTEND TIME TO RESPOND TO PETITION FOR REVIEW (First Request)

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs Laura Leigh and Wild Horse Education ("Plaintiffs"); Defendants Interior Board of Land Appeals, United States Department of Interior, Bureau of Land Management ("Federal Defendants"); and Defendant KG Mining (Bald Mountain) Inc.¹ ("KG Mining") hereby stipulate, agree, and respectfully request the Court extend the deadline for KG Mining to respond to the Petition for Review (ECF No. 1) ("Petition") **from March 7**, **2025**, **to March 20**, **2025**.

The response deadline for Federal Defendants is currently March 10, 2025. KG Mining participated in the underlying administrative appeal as an intervenor. In this action, the Petition challenges the Interior Board of Land Appeals' decision denying Plaintiffs' standing to bring an

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¹ Plaintiffs have named "KG Mining Inc." as a Defendant, but no such entity exists.

1 administrative appeal. In light of this procedural posture, KG Mining and Federal Defendants agree 2 the Federal Defendants should respond to the Petition first. KG Mining will respond ten (10) days 3 after the Federal Defendants' response. Plaintiffs do not oppose this request. 4 The parties do not seek this extension for the purposes of delay and this is the first request 5 for an extension of time for KG Mining to respond to the Petition. Accordingly, the parties request that the Court grant KG Mining an extension of time to respond to the Complaint until March 20, 6 7 2025. 8 DATED: March 4, 2025. DATED: March 4, 2025. 9 GREENFIRE LAW, PC **UNITED STATES ATTORNEY** 10 /s/ Jessica L. Blome /s/ Nicole R. Leibow Jessica L. Blome, Esq. (pro hac vice) Sue Fahami, Nevada Bar ID No. 5634 11 J. Rae Lovko, Esq. (pro hac vice) Acting United States Attorney, District of Nevada Patrick A. Rose, Nevada Bar ID No. 5109 2748 Adeline St., Suite A 12 Berkeley, CA 94703 Assistant United States Attorney jblome@greenfirelaw.com Nicole R. Leibow, NY Bar ID No. 5583174 13 rlovko@greenfirelaw.com Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 14 Brent M. Resh, Nevada Bar ID No. 14940 Las Vegas, Nevada 89101 BRENT RESH LAW, PLCC (702) 388-6336 15 2104 La Solana Way Patrick.Rose@usdoj.gov Las Vegas, NV 89102 Nicole.Leibow@usdoj.gov 16 brent@brentreshlaw.com Attorneys for Federal Defendants Attorneys for Plaintiffs 17 DATED: March 4, 2025. 18 PARSONS BEHLE & LATIMER 19 /s/ Ashley C. Nikkel Jim B. Butler, Nevada Bar ID No. 8389 20 Ashley C. Nikkel, Nevada Bar ID No. 12838 50 West Liberty Street, Suite 750 21 Reno, NV 89501 jbutler@parsonsbehle.com 22 anikkel@parsonsbehle.com Attorneys for Defendant KG Mining (Bald Mountain) Inc. 23 24 IT IS SO ORDERED. 25 Dated: March 5 . 2025. 26 27 28

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LATIMER